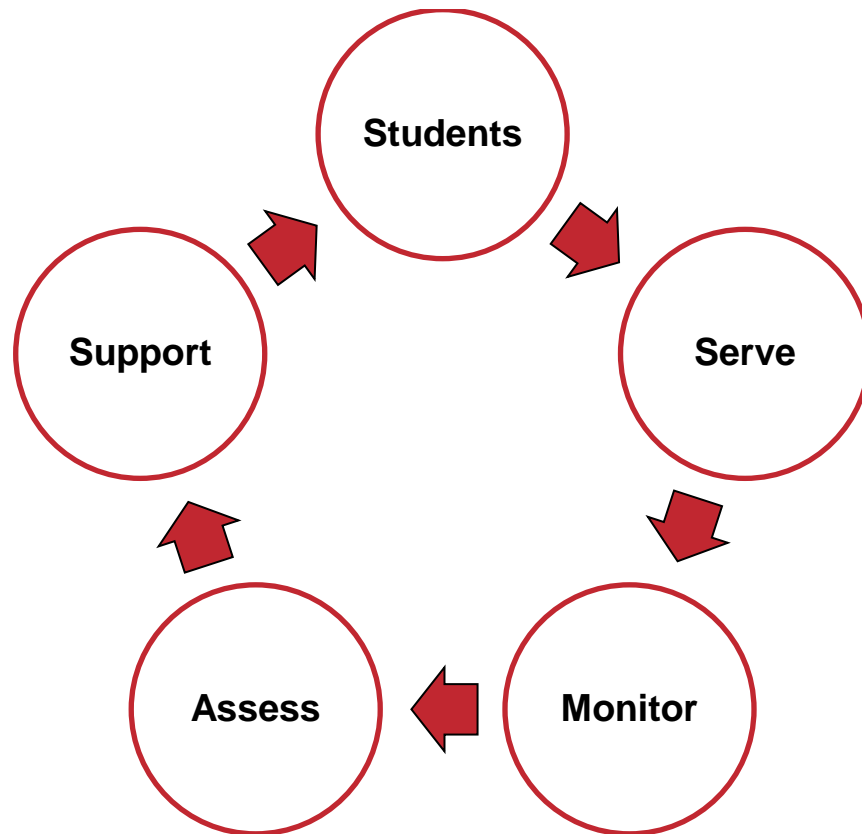# Montana's
Three Tiers of Accessibility:

Standardized Tiers of Accessibility for All Learners to Serve-Monitor-Assess-Support Students in State Assessments

Effective August 2022

All accredited schools must annually administer the state assessments approved by the Montana Board of Public Education and follow the test administration protocols according to the standardized procedures published by the Montana Office of Public Instruction (OPI). These policies and procedures provide documentation of the test accessibility needs used by the OPI to ensure all students can meaningfully participate in state assessments under the obligations of Title I of the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the Every Student Succeeds Act (ESSA).

Purpose

Montana's three tiers of accessibility is a process that represents a thoughtful and systematic approach to addressing student needs for state assessments. As required under the Elementary and Secondary Education Act (ESEA) reauthorized as Every Student Succeeds Act (ESSA), state assessments must be valid and accessible for use by all students, including students with disabilities and English learners (ELs). In addition to the ESEA-ESSA participation requirements, the reauthorization of the Individuals with Disabilities Education Act (IDEA) required that all students with disabilities must be included in state assessments. These provisions have prompted the creation of a range of test participation options, making it possible for students with even the most significant disabilities to be assessed on state assessments that are aligned with the general state education content standards.

The Montana Comprehensive Assessment System (MontCAS) program has, to the extent practicable, developed its state assessments using the principles of Universal Design for Learning (UDL) so that assistive technologies can be available to all students within each test delivery system and to (A) provide flexibility in the ways information is presented, in the ways students respond or demonstrate knowledge and skills, and in the ways students are engaged; and to (B) reduce barriers in instruction and assessments (see 34 CFR 200.2(b)(2)).

The MontCAS state assessments provide appropriate accommodations, supports, and challenges that require educators to maintain high achievement expectations for all students. The OPI adapted the Individual Student Accessibility and Accommodations Profile (ISAAP) to serve as a tool for teams of educators to determine accessibility needs and through the process scaffold the preparatory steps that allow them to select appropriate accessibility features (i.e., universal tools, designated supports, and/or accommodations) for the purposes of state testing.

The overall goal of using the ISAAP process is to replicate to the extent possible the classroom experience within the testing experience to permit students to fully demonstrate what they know and can do by providing a comfortable and fair testing opportunity to demonstrate their excellence. The following guidelines illustrate the steps needed to ensure that all students can meaningfully participate in state assessments. This guidance was prepared to ensure that general and special education teachers, paraprofessionals, teachers of ELs, specialized instructional support personnel, and other appropriate staff receive necessary training to administer assessments (34 CFR 200.6(b)(2)(ii)), including, as necessary, Alternate Assessments. Optimally, the ISAAP process is a team approach.

These guidelines apply to all students. They emphasize an individualized approach to the implementation of assessment practices for those students who have diverse needs and participate in large-scale content assessments. Accessibility features must be determined based on individual student needs consistent with all state and federal laws and regulations (ARM 10.56.104(1)). At the same time, this systematic approach supports important instructional decisions about accessibility and accommodations for students who participate in state assessments. It recognizes the critical connection between accessibility and accommodations in instruction and accessibility and accommodations during assessment. Accessibility features are intended to reduce or even eliminate the effects of a student's learning challenges during instruction and on the results of assessments (34 CFR 200.6(b)(2)(i)(C)).

Decisions about how to assess students with disabilities must be made by a student's IEP Team under IDEA, the placement team under Section 504, or the individual or team designated by a district to make that decision under Title II of the ADA, as applicable, based on each student's individual abilities and needs (see Peer Review Guidance (2018) critical element 5.1). School districts must ensure the use of appropriate accommodations for students with disabilities 34 CFR 200.6(b)(3) and English learners 34 CFR 200.6(f)(2)(i) and that educational plans do not deny a student the opportunity to participate in the assessment or any of the benefits from participation in the assessment that are afforded to students without disabilities or English learner status. Implemented appropriately, these supports should not reduce learning expectations, nor should they give a student an unfair advantage.

All educators, parents and teams making decisions about how students will participate in state assessment must be aware of the testing plan for the student(s). The OPI encourages the testing process to resemble as closely as possible the real classroom experience/setting where the student is familiar with the supports and accommodations provided and has had the opportunity to practice these for at least three months before the assessment. Supports and accommodations should be similar to classroom instruction experiences and local assessments that the student participates in throughout the school year to accurately reflect their proficiency in math, science, reading/language arts, and English language proficiency, based on their learning experience.

Parents/guardians must be knowledgeable about the planned use of **accessibility features** for their child including awareness of the conditions under which the child will participate in the state assessment. The assessment experiences should be a reflection of the learning experience, and the testing location should be free from distractions and follow the OPI's policies and procedures for test security and administration.

Golden Rules for Accessibility

- Tools are used in instruction and assessment before the assessment (34 CFR 200.6(b)(2)(i)(C)).
- Test settings are determined on an individual basis (34 CFR 200.6(h)(4)(ii) and 34 CFR 200.6(b)(1)).
- Testing decisions are made by a team (e.g., the student, educators, specialists, and parents/guardians) (34 CFR 200.6(h)(4)(ii) and 34 CFR 200.6(b)(1)).
- Teachers maintain high expectations for all students (34 CFR 200.2(b)(2)(ii)(B))
- Staff work to reduce barriers so students can meaningfully access and participate in statewide assessments (34 CFR 200.2(b)(2)(ii)(B)).

What is a need-based approach?

The OPI uses a standardized system of three tiers of accessibility to support educators with the selection of student supports to serve the needs of all learners through a continuous service, assessment, monitoring, and needs learner cycle. This six-step, needs-based approach makes it possible for teams of educators to make appropriate selections of accessibility features for each student on an individualized basis. This cycle is systematic, data-based, and iterative as it is informed by student participation in and performance on state assessments in order to ensure that students are familiar with and have their needs met during their assessment opportunities.

The OPI collects these needs for accessibility through the test setting data collection within AIM/Infinite Campus. The hierarchy of the selecting accessibility features per the student's educational needs includes six components, that is, the (1) student group, (2) participation decision, (3) state assessment, (4) content area, (5) the supports and accommodations that meet the reason, and (6) a notes section for documentation of accessibility features or documentation for non-routine accommodations.

Table 1. Six Steps of Accessibility Features Based on Educational Needs

Step 1	Step 2	Step 3	Step 4	Step 5	Step 6
What student group best describes the child?	**How will the student participate in assessments?**	**What state assessment is this accommodation and/or support required for?**	**What content area is this accommodation and/or support required for?**	**Select the accommodations and/or supports from the drop-down menu:**	**Use the notes field to document any specifics about the selected supports/ accommodations.**
Select from the following options: • General Education Student; • Student with Disabilities (IEP or 504); • English Learner (EL); or • EL with Disabilities.	Select from the following options: (1) "with accommodation;" (2) "without accommodations;" or (3) "Alternate Assessment" checkbox.	See the OPI's Published Test Windows to determine the eligibility for each state assessment based on the student group.	Select the content area from the drop-down menu options: (1) "Mathematics; (2) "English language arts;" (3) "Science;" and (4) "English language proficiency".	The selection of supports and accommodations is done through a cascade.	Example: A student who is taking the science assessment will be using adaptive furniture; the team documents the specific furniture and how it is used. Note: this space is also used for any non-routine accommodations that must be requested through the MontCAS Application before they can be used.

Recognizing Needs in All Students

All students (including students with disabilities, ELs, and ELs with disabilities) are to be held to the same expectations for participation and performance on state assessments. Specifically, all students enrolled in the tested grades are required to participate in the general education state assessments as published in the OPI Test Windows except:

- Students with the most significant cognitive disabilities who meet the criteria for the Alternate Assessment based on Alternate Achievement Standards (approximately 1% or fewer of the student population). For more information on the policies for these students, refer to the Alternate Assessment Eligibility Guidelines.

- ELs who are enrolled for less than 12 months in a U.S. school instead may be exempt from one administration of the State's reading/language arts assessment (34 CFR 200.6(i)(1)(i)). For more information on the policies for these students, refer to the English Learner Guidance for School Districts.

Step 1: What student group best describes the child?

The first step in Montana's three-tiered accessibility approach is for the educator to determine "who" should participate in the state assessment. The simple answer is that all students are required to participate. State assessments are the primary indicator to understand student achievement over time and to ensure that all public-school students are learning the same state-defined content standards at grade-level. Through this achievement indicator the OPI is able to direct resources where they are most needed.

All children are entitled to receive a fair, equal, and significant opportunity to obtain a high-quality education and reach, at a minimum, proficiency on challenging academic content standards. ESEA-ESSA lays out the expectations for States and for local education agencies (or school districts) regarding student participation, and as such, are obligated to ensure that state assessments remain valid, reliable, and fair for the purposes for which the assessments are used (34 CFR 200.2(b)(4)(i)).

The testing, accountability, and reporting provisions under ESEA-ESSA adhere to the Title I Part A requirements for mathematics, reading/language arts (ELA), science, and English language proficiency (ELP) in specific grade levels. The varied use, needs, and purpose of these provisions have deliberate indicators that are used to identify schools with the greatest need and to direct services and supports accordingly. In the realm of state testing, the following sections are some examples of the way in which these student achievement data are used federally and within the OPI's accountability and reporting systems.

Figure 1. Testing, Accountability, and Reporting Systems

What are the requirements for accountability under ESEA-ESSA Section 1111(c)?

Accountability is intended to address educational needs and direct resources.
- Montana's federal accountability system was restarted to run the 2021-2022 school year data in the Fall of 2022.
- All accountability and school identification requirements are in effect.
- State assessment data from the 2021-2022 school year was used for the annual meaningful differentiation of schools.

- Each public school must be differentiated on an annual basis using the annual meaningful differentiation methodology that is based on these indicators and weighting criteria:
  - (1) Academic Achievement, (2) Progress, (3) Graduation Rate, and (4) ELP Progress, and (5) the School Quality or Student Success (SQSS) (see ESEA section 1111(c)(4)(C)(ii).

Presented in **Table 2** is a simplified depiction of "Table F" from the consolidated state plan (Montana ESSA State Plan) to showcase how assessment data is currently used within the federal accountability process with these five accountability indicators.

Table 2. Montana's Single Statewide System for Federal Accountability

#	Accountability Indicators	*Treated as K–8 System		High School System
		Elementary (K–5)	Middle (6–8)	High (9–12)
1	Academic Achievement	Proficiency on statewide mathematics and English language arts (ELA) assessments (25 pts)		Proficiency on statewide mathematics and ELA assessments (30 pts)
2	Academic Growth	Improvement on statewide mathematics and ELA assessments (30 pts)		NA
3	English Learner Progress	Applied to all schools with 10 or more English Learners (10 pts)		Applied to all schools with 10 or more English Learners (10 pts)
4	Four-year adjusted cohort	NA		Four-year adjusted cohort graduation rate (25 pts)
5	Flexibility (5th)	(School Quality and Student Success (SQSS))		
	Satisfactory Attendance	20 pts		15 pts
	College and Career Ready	NA		15 pts
	STEM Indicator	Proficiency on statewide science assessment (10 pts)		NA
	School Survey of Quality	5 pts		5 pts

What are the requirements for reporting under ESEA-ESSA Section 1111(h)?

Reporting provides transparent information on these achievement indicators and to support education information processes.
- Under Title I of the ESEA-ESSA, states and school districts are required to publish State and local report cards (see ESSA State Report Card). **Note**: this information is different from the Montana longitudinal data warehouse (GEMS) where in the fall of each year the OPI releases student proficiency and progress results.
- Schools are required to annually measure the achievement of not less than 95 percent of all students and students in each subgroup on its annual statewide assessments in reading/language arts and mathematics under ESEA-ESSA Section 1111(c)(4)(E).
- Any instances where it was unsafe for a student to participate in the state assessment due to COVID reasons must be reported to the OPI using the "Medical Exemption for COVID Reason" policy as defined within the MontCAS Policies and Procedures for Participation in State Assessments but only after all test opportunities have been exhausted throughout the published test window.
- Report cards must include information on the following categories:

- o Description of, and results from, the State accountability system;
- o Student achievement at each level of achievement on the reading/language arts, mathematics and science assessments required under ESEA-ESSA Section 1111(b)(2);
- o Information on school improvement funds under ESEA-ESSA Section 1003;
- o 4-year adjusted cohort graduation rates and, at the State's discretion, extended-year adjusted cohort graduation rates;
- o The number and percentage of English learners achieving English language proficiency;
- o Information on the progress of students toward meeting the State-designed long-term goals and measurements of interim progress under ESEA-ESSA Section 1111(c)(4)(A);
- o Students assessed and not assessed on the assessments required under ESEA-ESSA Section 1111(b)(2);
- o Information collected and reported in compliance with the Civil Rights Data Collection (CRDC) under 20 U.S.C. 3413(c)(1);
- o Information on educator qualifications;
- o Information on per-pupil expenditures;
- o Number and percentage of students with the most significant cognitive disabilities who take an alternate assessment under ESEA-ESSA Section 1111(b)(2)(D), by grade and subject;
- o Results at grades 4 and 8 on the reading and mathematics National Assessment of Educational Progress (NAEP);
- o Information on postsecondary enrollment; and
- o Any other information that the SEA deems relevant (see Non-Regulatory Informational Document).

What are the OPI's policies and procedures for participation in state assessments?

The OPI's participation policies start by first identifying the eligible schools, because the goal of the accountability process is to differentiate schools and to direct resources where they are most needed. The procedures for identification look at each school within Montana's 830+/- public- and non-public accredited schools.

This means school-level information must be as accurate as possible in the State Student Information System [SIS] known as "Achievement in Montana" (AIM/Infinite Campus). The AIM/Infinite Campus is the OPI statewide student information system where school districts must submit school and student information electronically to the OPI. The AIM/Infinite Campus system provides the OPI, the state of Montana, federal entities, and the education community, timely and accurate data about the progress of our students, schools, school districts, and the state. Therefore, the accuracy of the OPI's state assessments hinges on the quality of the student-level and school-level information reported to the OPI.

After school identification, the next step to maintain accuracy is to ensure the highest quality of student-level information within each school. In the OPI's data collection policies for test settings, it is important that student group characteristics are annually collected through AIM/Infinite Campus. Montana school districts and the OPI work in partnership to ensure that all data are collaboratively collected, maintained, and reported. Picture these students shown in **Figure 1**.

Figure 1. Cartoon image of a group of school aged children. This Photo by Unknown Author is licensed under CC BY-NC

There is some basic information that the OPI needs about these students to properly configure the test delivery system to match the student's group characteristics. It is the school district's and the OPI's dual responsibility to maintain accurate records of student details and group characteristics to ensure a clear picture of the child within the OPI's reporting systems. The student details and group characteristics include information such as:

- Student names, grade, race/ethnicity, IEP status, EL status, Section 504 status, economically disadvantaged status, etc.

For more information related to the manuals, resources, and trainings for AIM/Infinite Campus, visit the OPI AIM Page.

These group characteristics are important as they are required under ESEA-ESSA and state law to be reported in the OPI's longitudinal data warehouses for student achievement over time (i.e., GEMS) and with the Montana ESSA State Report Card. For assessment purposes, the crux of identification and educational services are derived from ensuring

accurate student records. These educational details ensure that families, schools, districts, and the OPI have a clear picture on individualized needs.

Figure 2 illustrates a Demo District from the online test delivery system known as the "Test Information Distribution Engine (TIDE)". The OPI provides key student details from the AIM/Infinite Campus educational record to each test delivery system for the purposes of testing, accountability, and reporting. For more information about this process, please refer to the MontCAS Policies and Procedures for Participation in State Assessments.

Figure 2. TIDE Student Demographics Screen Shot from a Demo District.

Who are these Montana students?

The [AIM Data Collection Schedule](#) has deadlines that align with the OPI's process for rostering students to each of the Test Delivery Systems [or [TDS Portals](#)]. The OPI expects all students enrolled in accredited schools with "primary" educational service type to be recorded in the AIM/Infinite Campus system. Only AIM/Infinite Campus student records that have these primary details for enrollment are provided to the OPI's test delivery contractors. More information about rostering students for the statewide assessments can be found in the [MontCAS Policies and Procedures for Participation in State Assessments.](#) To answer the question "Who are these Montana students?", this guide has defined the following student categories that include all students in the state of Montana:

General Education Students

General education students are those who do not have a documented disability or are not classified as English learners. But that doesn't mean that they might not benefit from certain accessibility features on state assessments like universal tools or designated supports. They are eligible for all universal tools and any designated supports deemed appropriate by their teacher(s) in the Test Settings for the respective test delivery system.

As shown in **Table 3**, the OPI reports approximately 148,000 students were enrolled in Montana's accredited schools in grades K–12 during the spring math, ELA, and science test windows. The enrollment breakdown for these students in each grade is roughly 11,500 students/per grade. In the tested math and ELA grades 3–8, there are about 70,000 student test takers. To better understand Montana's special population student group, the OPI summarizes the number of school-aged children who belong to each student group category here.

Table 3. Approximate Student Enrollments for the Testing Snapshot Taken on April 7, 2022.

Grade	K	1	2	3	4	5	6	7	8	9	10	11	12	Total
Apprx. Enrollment	13,000	11,300	11,200	11,300	11,200	11,500	11,200	11,600	12,000	12,200	11,600	10,500	9,700	148,300

Special Student Populations

Special student populations include students identified as eligible for special education services under the IDEA, students identified as disabled under Section 504 of the Rehabilitation Act, and students who are identified as English learners.

Students with Documented Disabilities

Students with documented disabilities are those who are eligible to receive special education services through IDEA or Section 504. These students have education plans that detail their specific learning needs, and the accommodations needed to access the general curriculum or assessment. Decisions about accommodations are made by either the IEP Team for students with disabilities who are being served under IDEA or the 504 Plan team for students with disabilities who require accommodations under the Americans with Disabilities Act (ADA). Members of these teams always include the parent and/or guardian of the student. IDEA requires specific members of the IEP team. Students with characteristics for this group are eligible for accommodations in the Test Settings for the respective test delivery systems.

Students with disabilities served under IDEA make up nearly 20,000 of Montana's enrolled students in grades Kindergarten (K) through Grade 12. In grades 3–8, roughly 10,000 students or 14% are considered as students with disabilities that are served under IDEA. This is comparable to the nation's statistics on the number of students with disabilities as reported by the National Center for Education Statistics (NCES), the number of students ages 3–21 who received special education services under the IDEA was 7.2 million or 15 percent of all public-school students in the 2020-2021 school year [source]. For more information on supporting the needs of students with significant cognitive disabilities, please read the Alternate Assessment Eligibility Guidelines.

English Learners

English learners are those students who have a documented language of impact that has influenced their academic English development and who have been screened for proficiency using a state-approved language assessment. These students are eligible to receive designated supports on assessments that align with their instructional experience. Montana's EL population is about 3,500 students in grades K–12 and nearly 2,000 ELs participate in math and ELA assessments, making up about 3% of the testing population.

Upon determination that a student is an English Learner, the student will immediately begin to receive appropriate English language development services from the school district. Districts should have a plan for EL services, supports, and instruction. The plan should include the district's processes for the following critical elements of EL education:

- The district will notify Parents/Families of the reasons for identification and the need for placement in a language instructional program using the statewide standardized EL Program Placement Letter (also see Parent Notification Letter 1 - Identification).
- The district will notify Parents/Families of the methods of instruction used in the program in which their child is, or will be participating, and the methods of instruction used in other available programs, including how such programs differ in content, instructional goals, and the use of English and a native language in instruction (see Parent Participation Invitation, English Learner Plan).
- The district will notify Parents/Families of how the English Learner program will specifically help their child learn English and meet age-appropriate academic achievement standards for grade promotion and graduation. The OPI provides these Modules for Developing an EL Program (Videos and Handouts) to guide program coordinators through the process (also see Appendix E: Suggested Interventions for EL Students, Appendix F: SIOP and CALLA Strategies for ELs).
- In the case of a child with a disability, the district will notify Parents/Families of how the English Learner program meets the objectives of the individualized education program/504 plan of the child.
- The district will provide teachers of English Learners, specialized instructional support personnel, and other appropriate staff the necessary training to administer assessments, and they must know how to administer state assessments and make use of appropriate accommodations during the assessment for all students (see Testing Settings and Training Toolkits).

As a general rule, a State must administer the English language proficiency assessment required under § 200.6(h) annually to all English learners in schools served by the State in all grades in which there are English learners, kindergarten through grade 12 (34 CFR 200.5(a)(2)) and in the instance of a recently arrived EL may exempt the EL from the accountability process in the ELA portion of the assessment if the student has been enrolled in U.S. schools for less than 1 full academic. All other English learners should participate in state assessments with or without allowed accommodations. For more information on English Learners and the standardized criteria for entrance and exit in the EL program, see the English Learner Guidance for School Districts.

With this summary, the reader has a better picture of the "who" these students are. The next phase is to determine the students need for participation in state assessments so that school districts can properly configure the test delivery system per the student's need.

What are the student privacy considerations?

As you think about these students and the identification requirements for these student group categories, it is necessary to adhere to the MontCAS Data Privacy and User Role and Responsibility. Federal law (i.e., the Family Educational Rights and Privacy Act (FERPA) and IDEA) prohibits the release of any student's personally identifiable information. Any printed or electronic materials with student information must be securely stored. Remember that student privacy is critical and that it is never allowable to violate personally identifiable information. The benefits of having and using student data must always be balanced with the need to protect student privacy and satisfy these statutory reporting needs. When planning and preparing for statewide assessments, or in the process of delivering tests to students, student confidentiality must be protected. When in doubt, err on the side of caution and seek assistance as to whether it is necessary to share that level of information. For more information on these privacy requirements, please visit the Student Privacy Technical Assistance Center.

Step 2: How will the student participate in assessments?

All students, including students with disabilities and English Learners, are required by state and federal law to take part in the state assessments with or without accommodations.

- Generally, if a student can receive instruction, then they are also able to participate in state assessments.
- All students enrolled in accredited schools are expected to take part in state assessments in one of three ways:
  1. Participate in general population assessments **without** accommodations.
  2. Participate in general population assessments **with** accommodations.
  3. Participate in **alternate assessments** when the participation criteria are met.

Step 3: What state assessment is this accommodation and/or support required for?

It is the OPI's and school district's responsibility to observe test administration activities and ensure that the state assessments are conducted in standardized and consistent manner throughout Montana. The OPI has procured the following state assessments to satisfy the annual requirement of state testing. All statewide assessments must be administered to students only by school district employees who have been trained and are familiar with standardized testing procedures (see ARM 10.56.103(2)). Before districts set up accessibility features in the test settings or deliver state assessments to students, the Test Administrators must familiarize themselves with the following manuals and training/certification requirements.

- ☐ MontCAS Test Security Manual;
- ☐ Online test administration training modules in the TDS portal; and
- ☐ Test Administration Manual (assessment-specific).

For more information on the training/certification requirements for each assessment, please read the MontCAS Test Security Manual.

Table 4. Montana Test Delivery Portals

ACCESS for **ELLs** English Language Learners	**MSAA** Multi State Alternate Assessment	**AMSA** Alternate Montana Science Assessment	**MSA** Montana Science Assessment	**SBAC** Smarter Balanced Assessment Consortium	**ACT** with Writing American College Testing
English Language Proficiency assessment for academic achievement reporting for English learners in Grades K–12.	Alternate math and reading/language arts assessment for academic achievement reporting in Grades 3–8 and 11 for Students with Significant Cognitive Disabilities (SwSCD).	Alternate science assessment for academic achievement reporting in Grades 5, 8, and 11 for Students with Significant Cognitive Disabilities (SwSCD).	General science assessment for academic achievement reporting in Grades 5 and 8.	General math and reading/language arts assessment for academic achievement reporting in Grades 3–8.	General math, reading/language arts, and science assessment for academic achievement reporting in Grade 11.

Needs-Based Selection of Test Settings

The selection of accessibility features is a systematic, data-based, needs-based process that is made by educators familiar with individual student needs in mind. During the development of the Smarter Balanced assessment a tool called the ISAAP was created. Smarter Balanced identified seven reasons for supports and accommodations and sorted the accessibility supports available for the Smarter Balanced test into those categories to provide a tool to help educators identify the available supports that are recommended for specific student needs. In Montana, the OPI added an additional category so that IEP teams can document supports for students with medical needs. The hierarchy of the cascade includes six components, that is, the (1) participation decision (2) state assessment, (3) content area, (4) reason for accessibility support, (5) the supports and accommodations that meet the reasons, and (6) a notes section for documentation of accessibility support specifics or documentation of non-routine accommodations.

To avoid a misadministration with supports and/or accommodations, follow the assessment-specific accommodation guidelines and the Test Accessibility Plan. System Test Coordinators are responsible for ensuring that all authorized persons have permissions in the necessary online test delivery systems to properly configure student test settings for tools, supports, and accommodations as required before administering assessments. Test administrators must be trained in the accommodation and support guidelines for each test in order to prevent testing incidents related to the misadministration of accommodations. Failure to comply with these accessibility rules must be reported as a testing incident and may violate student's rights within their IEP or OCR.

The plans should be maintained annually in accordance with local school district policies or at the preference of the STC for a period of at least three school years. The STC must affirm completion of the MontCAS Test Accessibility Plan on behalf of the school system in the MontCAS Application > Recorded Records Tracking screen and the OPI can request evidence of plans at any time throughout the school year and it is used with the LEA Title Monitoring - Common Compliance Areas.

Table 5. MontCAS Test Accessibility Plan

Test Accessibility Plan	Frequently Asked Questions
Test Accessibility Plan Sample Test Accessibility Plan	**Q: What are AIM/Infinite Campus "Ad Hocs"?** **A:** Ad Hocs are reports that can be downloaded from AIM/Infinite Campus to give an overview of the student data collected for a given school district. During the 2021-2022 school year, the OPI released State Published Ad Hocs including the "SPED Statewide Assessment Accommodations" available to assist schools with their AIM and test delivery reporting needs. The "SPED Statewide Assessment Accommodations" shows currently enrolled special education students that have an active IEP indicating statewide assessments marked with accommodations. The IEP Statewide Editor has an editor to provide additional support for IEP teams in implementing an individualized, need-based approach to selecting accommodations and supports for statewide assessments. **Q: What is a need-based approach?** **A:** The needs-based approach emphasizes that individual students learn and grow in unique ways, and that their various individual needs must be met in order to optimize their learning and participation in assessment, which serves as the measurement for growth.

The [Montana Testing Portal](#) houses the OPI's Smarter Balanced, Montana Science Assessments (MSA) and Alternate MSA resources, test preparation (TIDE), Test Administrator training/certification, practice/training tests, tools for teachers, and the summative and interim test delivery system.

The Building Coordinator (or BC) role or above are the only Test Information Distribution Engine (TIDE) roles allowed to select accommodations in the Test Settings section of TIDE.
- The "BC" role can enter accommodations into the "Test Settings" portion of TIDE.
- System Test Coordinators (or TIDE "AR" or "STC" roles) may assign "BC" roles to more than one person in a school.
- Some school systems have schools with staff with specialized training in IEPs/504s and English Learners (EL).
- Schools with this capacity may assign the "BC" role to one or more of their Special Education or EL teachers to provide appropriate accommodations in TIDE.
- For more information on user roles in the Montana Test Portal, read the [User Roles and Access Document](#).

Step 4: What content area is this accommodation and/or support required for?

The purpose of state assessments is to measure students' proficiency and progress toward proficiency in state content standards over time in order to help Montana monitor and address educational needs across the state. The state assessments are aligned to challenging academic content standards in order to provide coherent and timely information about student attainment of those standards and whether a student is performing at the grade level in which the student is enrolled ([34 CFR 200.2(b)(3)(i)(B)](#)).

Therefore, it is imperative that school districts use the assessment-specific accessibility and accommodation guidance from each state assessment program. Any use of accommodations that violates the integrity of the assessment (i.e., fairness, consistency, validity, reliability, comparability, and accuracy) can result in score invalidations. These terms are known as test fraud and modification. Any change away from a standard administration that is not listed in the OPI's assessment-specific accessibility and accommodation guidelines can be considered a modification. A modification compromises the intent of the assessment through a change in the learning expectations, construct, or content that is to be measured [see **Table 6**]. The intentional violation of the OPI's policies and procedures for test accessibility, participation, security, and administration is considered test fraud.
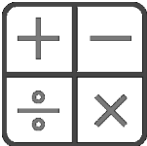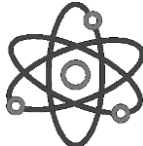
Test fraud is any set of activities that are illegal, inappropriate, or against the rules/standards.

Modification is any practice or procedure that compromises the intent of the assessment through a change in the learning expectations, construct, or content that is to be measured, grade-level standard, or measured outcome of the assessment that is not authorized explicitly by the OPI. Any change away from a standard administration that is not listed in the OPI's assessment-specific accessibility and accommodation guidelines can be considered a modification.

The OPI has determined that the accessibility features provided in these assessments:
   (1) are appropriate and effective for meeting the individual student's need(s) to participate in the assessments;
   (2) do not alter the construct being assessed; and
   (3) allow meaningful interpretations of results and comparison of scores for students who need and receive accommodations and students who do not need and do not receive accommodations.

Table 6. OPI Content Area and Grade Expectations

Content Area	English Language Arts (ELA)	Mathematics	Science	English Language Proficiency (ELP)
Adopted Standards	10.53.501–517	10.53.401–413	10.53.801–810	10.53.301–311
Tested Grades	3–8 & 11	3–8 & 11	5, 8, 11	K–12

Step 5: Select the accommodations and/or supports.

The next step of the process is to select appropriate accommodations and/or student supports.

Figure 3. Montana's Three-Tiered Approach

Accommodations
Available to students with IEPs and/or 504 plans

1

Closed captioning
Scribe
Read Aloud

Designated Features
Available to all students according to instructional experience

2

Illustration Glossaries
Translated Test Directions
Separate Test Setting

Universal Features
Available to all students based on preference

3

Calculator
Digital Notepad
Highlighter

Test settings refer to accessibility features that are offered within the OPI's online test delivery systems most commonly known as universal tools, designated supports, and accommodations. The OPI's allowable test settings do not change what is being tested (e.g., these might include change in setting, scheduling timing of test administration, alternative ways the test questions are presented to the student, and/or changes in the way in which a student produces a response to test questions). Because these accessibility features do not change what is being tested, there is no impact on the validity and use of the test score.

Many of these features are both embedded and non-embedded, depending on the assessment. This three-tiered approach is intended to serve the vast majority of students and their needs and follows the Universal Design for Learning principles as required under ESEA-ESSA.

Table 6. Accessibility Features Explained with Examples

Accessibility Feature Example	Accessibility Feature
Breaks Calculator Digital Notepad Highlighter	**Universal Tools** are available to all students who can benefit from such. These resources are either provided as digitally delivered components of the test administration system or separate from it. These are not modifications and yield valid scores that count as participation in state assessments. Universal tools may be embedded in the test software (like a highlighter tool) or be provided by the test administrator (like scratch paper) and are available to any student. These are intended to mirror the types of tools that students use regularly and at will in the classroom. They should be assistive and not distractive to students. Consultation on whether the tool is helpful to the student or harmful is important to provide an individual, needs-based approach.
Color Choices Illustration Glossaries Medical Supports Translated Test Directions Separate Test Setting	**Designated Supports** can be turned on as determined by the student's educational team and do not require an IEP or 504 plan. Designated supports are those features that are available for use by any student for whom the need has been indicated by an educator (or team of educators) with

HOPE — WHOLE CHILD APPROACH
TEACH — TEACHER & EDUCATIONAL LEADERS
LEARN — ACADEMIC ACHIEVEMENT
READY — COMMUNITY, COLLEGE & CAREER

	the parent/guardian and student. These are not modifications and yield valid scores that count as participation in state assessments. Designated supports and accommodations must be arranged in advance of test administration. The designated supports can be turned on for any student and are meant to serve the principle of alignment between testing and instructional experiences.
Closed captioning Scribe Speech-to-text Read Aloud	**Accommodations** help certain students access the general education curriculum and should be used in instruction and assessment throughout the year. Accommodations can only be turned on as specified in a student's IEP/504 plan. Accommodations are changes in procedures or materials that increase equitable access during state assessments. Properly administered accommodations yield valid scores that count as participation in state assessments. They allow students to show what they know and can do. There is no accommodation (including oral presentations) that provides an opportunity for a student to request or receive help on a specific word, phrase, line, pronunciation, definition, item, question, answer choice or any part of the assessment. Accommodations do not override a standardized test administration or the need for students to work independently. **Note:** Any change away from a standard administration that is not listed in the OPI's assessment-specific accessibility and accommodation guidelines can be considered a test modification.

Here are a few rules to accommodations:

- Decisions about how to assess must be made by a student's IEP Team under IDEA, the placement team under Section 504, or the individual or team designated by a district to make that decision under Title II of the ADA, as applicable, based on each student's individual abilities and needs.
- Students with disabilities must have equal opportunity to participate in the state assessments and receive accommodations and support per their educational plan.
- **Ensure that testing plans do not deny a student with a disability or an English learner the opportunity to participate in the assessment or any benefits from participation in the assessment.**

Entering Test Settings in TIDE

In this section, the steps on how to input designated supports and accommodations for students in TIDE is shown. The TIDE User Guide describes how to edit "Test Settings". The selection of accessibility supports (universal tools, designated supports, and accommodations).

Figure 4. TIDE Embedded Designated Supports

Designated Supports (Embedded)	ALT Science	ELA	ELA-PT (Interim ONLY)	Mathematics	Science
Color Choices	None	None	Medium Gray on Light Gre	None	None
Masking	OFF	OFF	OFF	OFF	OFF
Mouse Pointer	System Default	System Default	Extra Large Green	System Default	System Default
Permissive Mode	OFF	ON	ON	OFF	OFF
Streamlined Mode	OFF	OFF	OFF	ON	OFF
Text-To-Speech (Designated Supports and Accommodations). Passages and Passages and Items for ELA CAT are Accommodation Only.Use must be written into a student's IEP/504 plan.	⊘	None	None	None	None
Translations (Glossaries)	⊘	No Word List Available	No Word List Available	No Word List Available	⊘
Zoom	1X	3X	1X	1X	1X

Figure 5. TIDE Embedded Accommodations

Accommodations (Embedded)	ALT Science	ELA	ELA-PT (Interim ONLY)	Mathematics	Science
Language (Designated Supports and Accommodations). Stacked Spanish Translations for Mathematics are considered a Designated Support ⑦	English ▼	English ▼	English ▼	Spanish ▼	English ▼
American Sign Language ⑦	⊘	ON	⊘	OFF	⊘
Audio Transcriptions ⑦	⊘	OFF	⊘	⊘	⊘
Braille Type ⑦	⊘	Not Applicable ▼	Not Applicable ▼	Not Applicable ▼	Not Applicable ▼
Closed Captioning ⑦	⊘	OFF	⊘	⊘	⊘
Speech-to-Text ⑦	⊘	OFF	OFF	OFF	⊘

To help school districts select appropriate accessibility features for state testing by student need, the OPI has created a Master List of the Possible Test Setting Values for Each State Assessment matrix document. The OPI encourages school districts to use this resource to identify the classroom and local assessment accessibility features that are made available throughout the academic year and in instruction that should also be configured in the test settings for each state assessment. The information can be filtered by delivery format (embedded or non-embedded) and by accessibility feature.

Figure 6. Master List of the Possible Test Setting Values for Each State Assessment

Code	Option	Test Setting Labels	IEP/504	EL	Montana Science Assessment [MSA]	Alternate Montana Science Assessment [AMSA]	MSAA ELA	MSAA Math	Smarter Balanced ELA	Smarter Balanced Math	Smarter Balanced Math-PT
Accommodation	Non-Embedded	100s Number Table	Yes							Yes	Yes
Accommodation	Embedded	Abacus (Embedded)	Yes								
Accommodation	Non-Embedded	Abacus (Non-Embedded)	Yes							Yes	Yes
Universal	Non-Embedded	Adaptive and Specialized Equipment or Furniture	Yes	Yes							
Supports	Embedded	Adaptive and Specialized Equipment or Furniture (Embedded)	Yes	Yes							
Supports	Non-Embedded	Adaptive and Specialized Equipment or Furniture (Non-Embedded)	Yes	Yes							
Supports	Embedded	Allowed Reading	Yes	Yes			Yes	Yes			
Supports	Embedded	Alternate Color Theme Tool	Yes	Yes			Yes	Yes			
Accommodation	Non-Embedded	Alternate Response Options	Yes		Yes	Yes			Yes	Yes	Yes
Supports	Non-Embedded	Alternative Microphone	Yes	Yes							
Supports	Embedded	Alternative Text	Yes	Yes			Yes	Yes			
Supports	Non-Embedded	Amplification	Yes	Yes	Yes	Yes			Yes	Yes	Yes
Universal	Embedded	Answer Eliminator (Embedded)	Yes	Yes							
Universal	Non-Embedded	Answer Eliminator (Non-Embedded)	Yes	Yes							
Supports	Embedded	Answer Masking Tool	Yes	Yes			Yes	Yes			
Universal	Embedded	Answer Masking Tool (Embedded)	Yes	Yes							
Universal	Non-Embedded	Answer Masking Tool (Non-Embedded)	Yes	Yes							
Supports	Non-Embedded	Assistive Devices	Yes	Yes							
Accommodation	Non-Embedded	Assistive Technology	Yes				Yes	Yes			
Universal	Non-Embedded	Audio Aids	Yes	Yes							
Supports	Embedded	Audio Amplification/FM System (Embedded)	Yes	Yes							
Supports	Non-Embedded	Audio Amplification/FM System (Non-Embedded)	Yes	Yes							
Supports	Embedded	Audio Player Tool	Yes	Yes			Yes	Yes			
Supports	Non-Embedded	Bilingual Dictionary	Yes	Yes	Yes	Yes			Yes		
Supports	Non-Embedded	Bilingual Word-to-Word Dictionary	Yes	Yes							
Accommodation	Embedded	Braille (Embedded)	Yes		Yes				Yes	Yes	Yes
Accommodation	Non-Embedded	Braille (Non-Embedded)	Yes		Yes		Yes	Yes	Yes	Yes	Yes
Accommodation	Embedded	Braille Transcript	Yes						Yes		
Universal	Embedded	Breaks (Embedded)	Yes	Yes	Yes	Yes			Yes	Yes	Yes
Universal	Non-Embedded	Breaks (Non-Embedded)	Yes	Yes	Yes	Yes			Yes	Yes	Yes
Accommodation	Non-Embedded	Breaks as Needed (Standard Time)	Yes								
Universal	Non-Embedded	Calculator (Accessible - Online)	Yes	Yes							
Universal	Non-Embedded	Calculator (Accessible - Paper)	Yes	Yes							
Universal	Embedded	Calculator (Embedded)	Yes	Yes	Yes						
Universal	Non-Embedded	Calculator (Non-Embedded)	Yes	Yes	Yes	Yes					
Universal	Non-Embedded	Calculator [Items Only Grades 6-8]	Yes	Yes						Yes	Yes
Universal	Embedded	Calculator [Items Only Grades 6-8]	Yes	Yes						Yes	Yes

[Column A] is used to signify the accessibility feature which is based on the three-tiers of accessibility (i.e., universal, supports, accommodation). The Possible Values are:
- Yellow rows = "Universal" Tool
- Blue rows = Designated "Supports", and
- Green rows = "Accommodation"

This spreadsheet serves the purposes of (1) providing school districts with technical assistance support and (2) to allow the OPI to begin its pilot project for interoperability to transfer the test setting data collections from AIM/Infinite Campus to the Montana Testing Portal.

[Column B] is the non-embedded/embedded designation. The Possible Values are:
- Embedded= provided online/delivered by the test delivery system
- Non-embedded = not provided online/delivered by the district

[Column C] this column includes the Possible Values [Or Labels] for each Test Setting that can be locally configured within the online test delivery system. **Note:** These labels have been matched as closely as possible to the language of the assessment-specific accessibility and accommodation guide for each state assessment.

[Columns D and E] shows the special population student group categories in order to identify the student need by these criteria. Although this Master List Excel spreadsheet only displays IEP/504 and EL categories, it is important to note that accessibility is for all learners. For example, general education students are entitled to universal tools but given the structure of the spreadsheet have been omitted. Also, struggling readers or high-risk students are eligible for designated supports as long as a team of educators has determined the appropriateness of the support and these details are not published in the resource. For the purposes of the resource Column D displays "IEP/504" student test setting options and Column E displays "EL" student test setting options.

English learners have student test setting options for universal tools and designated supports. Students with disabilities (IEP/IDEA) have student test setting for universal tools, designated supports, and/or accommodations.

In the spreadsheet, this means in Column D for "IEP/504" the possible values say "Yes" because these students are eligible to receive the full suite of accessibility features (i.e., Universal Tools, Designated Supports and Accommodations). In Column E, this means that for EL students the possible values are for Universal Tools and Designated Supports say "Yes". **Note**: if the EL has an IEP/504 then these designations supersede the EL designation and will permit the accommodation values as well.

For more information on this spreadsheet, visit the Master List of the Possible Test Setting Values for Each State Assessment, contact the OPI Assessment Help Desk at 1-844-867-2569 or opiassessmenthelpdesk@mt.gov.

Step 6: Use the notes field to document any specifics about the selected supports/ accommodations.

Non-routine accommodations or accommodations that are administered improperly can change what is being tested, the student score may be considered invalid and result in the student being considered as a non-participant when calculating participation rates for the OPI accountability process. Accommodations not routinely approved for state assessments that are described in a student's IEP/504 plan or EL plan must be submitted to the OPI to be approved and used during the administration. These requests for non-routine administrations must be made through the MontCAS Application > Non-Routine Request Process. The OPI must approve all non-routine accommodations used in the state assessments before a student can receive them. This policy ensures students, parents, teachers, and schools are aware that some accommodation decisions may impact accountability and reporting.

Frequently Asked Questions

Q: What if my IEP/504 students aren't showing up in TIDE correctly?

A: First, make sure the student's IEP is locked. The only way this value is reflected at the state-level is if this is locked.

- If the IEP is locked, please refer to the TIDE Upload Schedule.
- The actual transfer of data takes place during nighttime hours, so uploads done on one day will not appear in TIDE until the following day, provided all updated information has been synced to AIM/Infinite Campus.
- Any further questions or in case your questions weren't answered, please contact the OPI Assessment Help Desk at 1-844-867-2569 or e-mail us at OPIAssessmentHelpDesk@mt.gov.

Q: What happens in TIDE if I try to select accommodations for a student who does not have an IEP/504 plan for the ELA CAT?

A: School Coordinators trying to input accommodations for students without these AIM flags will receive an error message stating:

> *"Invalid Value. Text-To-Speech (Designated Supports and Accommodations). Passages and Passages and Items for ELA CAT are Accommodation Only. Use must be written into the student's IEP/504 plan. Cannot be ELA: Passages since IDEA Indicator/IEP is set to No. and section 504 is set to No."*

Q: Can a student be exempted from participating in state testing in the educational plan (e.g., IEP, 504, EL)?
A: No. Students CANNOT be exempted from state testing through an IEP, 504 Plan, and/or an EL designation, for more information on making state assessments accessible to all students, contact:

IEP Questions?	504 Questions?	EL Questions?	Test Questions?	AIM Questions?
Contact OPI Student Support and Services or your Special Education Monitor.	Contact OCR Regional Office Technical Center at 1 800-421-3481 or email ocr@ed.gov.	Contact the OPI EL Instructional Specialist.	Contact OPI Assessment Help Desk at 1-844-867-2569.	Contact the OPI AIM Help Desk at 1-877-424-6681 or 406-444-3800.

Q: What Does Non-Participation Mean State Assessments?
A: There are special circumstances and educational situations where participation of 95% of all students/subgroups is not possible. However, students may only be exempted from testing under certain, limited conditions. In these rare and unique instances, a student may be unable to participate in any part of the assessment due to a significant and documented medical reason. This is considered an allowable exemption. Generally, if a student can receive instruction, then they are also able to and expected to participate in state assessments.

Q: What does the MontCAS Application Collect?
A: The MontCAS Application is the OPI's restricted, centralized application for matters of Test Security: such as (1) STC Test Security Agreement, (2) STC Required Records Tracking, and (3) Testing Incidents - If a test irregularity results in a score invalidation, it does have the potential to impact participation/performance for schools in the annual meaningful differentiation process. The MontCAS Application also collections information on (4) Non-Participation - Only medical reasons count for exemptions from participation. Non-participation for any other reason than a "medical exemption" counts negatively against the school's participation rate calculation in the accountability process. The last aspect of the applications is for Test Administration needs e.g. (5) Order Materials or (6) Non-Routine Accommodation.

Q: May a State use indicators in the accountability system that are not statewide?
A: No. ESEA-ESSA Section 1111(c)(4)(B) requires that each indicator that the State uses in its accountability system be statewide for all students in the State. This is important to ensure schools are evaluated consistently in the State accountability system. Non-statewide indicators, such as indicators based on local assessments, do not provide comparable information about the performance of schools for accountability purposes, including identifying schools for comprehensive, targeted, or additional targeted support and improvement. Data from these kinds of measures may be better suited to inform instruction or additional student and educator supports.

We are here to help. Contact us.
Assessment Help Desk: 1-844-867-2569
ASSESSMENT TEAM

Glossary
For assessment defined terms, visit the MontCAS Test Security Training Portal.

Questions? Contact the Assessment Help Desk at 1-844-867-2569 or opiassessmenthelpdesk@mt.gov.